

SITE: McDonough Hwy 81 Drum  
BREAK: 2.9  
OTHER: \_\_\_\_\_

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
\$250,000 EMERGENCY ACTION MEMORANDUM**

**Date:** April 30, 2008  
**Subject:** McDonough Highway 81 Drum Dump Site  
McDonough, Henry County, Georgia  
**From:** Jeffery J. Crowley  
OSC, Emergency Response and Removal Branch (ERRB)  
**To:** Regional Emergency Operations Center, 4WD-ERRB  
Shane Hitchcock, ERRB  
Matt Taylor, ERRB  
Georgia Environmental Protection Division (GAEPD)  
Site File

**I. PURPOSE**

The purpose of this memorandum is to document the decision to initiate emergency response actions described herein for the McDonough Highway 81 Drum Dump Site (the "Site") located in McDonough, Henry County, Georgia under the OSC's \$250,000 authority.

**II. BACKGROUND**

**Site Number:** A4SX  
**TO Amount:** \$10,000  
**TO Number:** 0704-F4-0008  
**Contractor:** Environmental Restoration  
**CERCLIS Number:** GAN000410206  
**Response Authority:** CERCLA  
**State Notification:** April 30, 2008  
**Start Date:** April 30, 2008  
**Completion Date:**  
**Demobilization Date:**  
**NPL Status:** Non-NPL

**III. SITE INFORMATION**

**A. Incident Category:**

- \_\_\_ Active Production Facility
- \_\_\_ Inactive Production Facility
- \_\_\_ Active Waste Management Facility
- \_\_\_ Inactive Waste Management Facility



10597056

- ☒ Midnight Dump  
☐ Transportation Related  
☐ Other (specify)

**B. Site Location**

**1. Site Description**

**a. Removal Site Evaluation**

On Wednesday April 30, 2008, Georgia Environmental Protection Division (EPD) requested assistance with an abandoned drum in a rural area of McDonough, Georgia. The drum was discovered about a month before by the property owner (PO). On April 27, 2008 the PO again visited the drum to move it and noticed a strong chemical smell coming from it. He notified EPD who responded and then notified EPA.

The morning of April 30, 2008, OSC Crowley was dispatched to the Site to assess the condition of the drum and oversee the removal. The OSC was met on scene by the PO. After a recon of the site, it was determined that there was just one drum dumped there and no others. The drum has a strong chemical smell emanating from it and is actively leaking from the bung on top. EPD informed the OSC that they did not have the funds to dispose of the drum and that they would like EPA assistance in dealing with it.

**b. Physical location and Site Characteristics**

The Site is located at 5238 GA Highway 81 East, McDonough, Henry County, Georgia. The location of the drum is on private property that is used for timber harvesting. The drum was located about 200 yards back from Highway 81 on its side up against a pile of downed trees. The property is fenced and gated. The fence and gate were installed after the discovery of the drum by the PO.

**c. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant**

There is an abandoned drum located on the site, near a public road. The drum is thought to contain a hazardous material as a quick pH was conducted on a leaking drum and found to be 14. The drum is also leaking. The specific contents of the drum are unknown.

**d. Maps, pictures, and other graphic representations**

Maps, pictures, and other graphic representations can be made available upon request.

## 2. Description of threat

Section 300.415 of the National Contingency Plan (NCP) lists a number of factors to be evaluated in determining the appropriateness of a removal action. The following paragraphs apply to the Site:

**§300.415(b)(2)(i). "Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants."**

There is an abandoned drum that contains a hazardous substance, pollutant or contaminant located at the Site. The drum is located near a public road which borders the Site. There is a fence preventing vehicle access to the property that could be climbed by anyone looking to trespass onto the Site. Once onsite, the trespasser could potentially be exposed to hazardous substances.

**§300.425(b)(2)(iii). "Hazardous Substances or pollutants or contaminants in drums, barrel, tanks, or other bulk storage containers, that may pose a threat of release."**

There is an unsecured, abandoned drum containing a hazardous substance, pollutant or contaminant on the site. The integrity of the drum is questionable due to the unknown length of time it has been sitting in the woods. The drum also shows visible signs of rusting. As mentioned earlier, the drum is currently leaking. In addition, trespassers or vandals could access the site and cause a release by tampering with the drum.

**§300.415(b)(2)(vii). "The availability of other appropriate Federal or State response mechanisms to respond to the release."**

At this time there exist no additional State mechanisms that are able to respond to this incident in the required manner. EPA initially assumed cleanup activities at the Site through a State referral.

## IV. PLANNED REMOVAL ACTIVITIES

Anticipated immediate removal activities for the Site include, but are not limited to, the following:

- Emergency stabilization of the drum which is leaking and has questionable integrity;
- Sampling of the drum for hazard categorization to determine the specific nature of contents of the drum, if necessary;
- Bulking of materials and disposal off site, if necessary, in compliance with Federal regulations including the CERCLA off site rule.

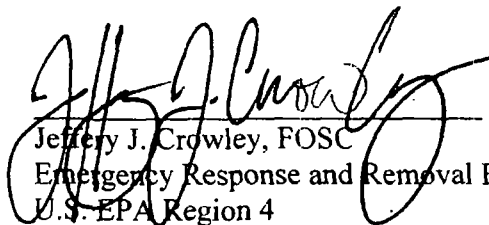
## V. BUDGET

The total Site ceiling for this emergency action is \$250,000. The budget has been structured as appears below. Changes in the structure may be made by the OSC at his/her discretion.

ERRS	150,000
Contingency	<u>100,000</u>
<b>TOTAL</b>	<b>250,000<sup>1</sup></b>

## VI. APPROVAL

As conditions noted on April 30, 2008 at the McDonough Highway 81 Drum Dump Site meet conditions set forth under Section 300.415 of the NCP, the FOSC has initiated funding of an emergency removal action.

 4/30/2008  
Jeffery J. Crowley, FOSC  
Emergency Response and Removal Branch  
U.S. EPA Region 4

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<sup>1</sup> Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.